



**Office of the New York State
Attorney General**

**Letitia James
Attorney General**

April 28, 2025

VIA ECF

Hon. Brenda K. Sannes, Chief U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse NY 13261-7336

Re: *Alaei v. SUNY Albany*
Northern District of New York
21-CV-377 (BKS/TWD)

Dear Hon. Judge Sannes:

This matter is scheduled for trial before your Honor beginning May 27, 2025. Please accept this correspondence as Defendant's request regarding three items. First, Defendant requests that one of their witnesses be permitted to testify virtually. The reason for this request is that the witness lives out of state, works full time, and has a small child. Plaintiff's counsel consents to this request.

Second, it is Defendant's understanding that Plaintiff intends to call several of Defendant's witnesses as part of his case. Accordingly, Defendant's request permission to conduct a direct examination during the cross-examination of these witnesses. Defendant makes this request for the purposes of efficiency.

Lastly, Defendant's counsel provided Plaintiff with a proposed joint pre-trial stipulation. We have not yet had the chance to come to an agreement regarding the same. Accordingly, Defendant requests additional time to complete and file the joint pre-trial stipulation.

Thank you for the Court's consideration and should anything further be required, please contact the undersigned.

Respectfully,

By: _____
David C. White
Assistant Attorney General
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Email: David.White@ag.ny.gov

Cc: All counsel of record (via ECF)